

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

AMERICAN ASSOCIATIONS OF  
UNIVERSITY PROFESSORS, ET AL.,

*Plaintiffs,*

v.

MARCO RUBIO, in his official capacity as  
Secretary of State, and the DEPARTMENT OF  
STATE, ET AL.,

*Defendants.*

No. 1:25-cv-10685-WGY

**NOTICE OF MANUAL  
FILING, IN CAMERA AND  
EX PARTE**

**DEFENDANTS' OBJECTIONS TO DISCLOSURE OF,  
AND ASSERTIONS OF PRIVILEGE OVER, SUBSET OF  
IN CAMERA DOCUMENTS IDENTIFIED BY THE COURT ON JULY 8, 2025**

In accordance with the Court's instructions from the bench on July 8, 2025, that Defendants raise any objections to the disclosure of certain in camera documents probed by the Court before 10:45am on July 9, 2025, Defendants hereby submit the enclosed privilege log (partially redacted for privilege in the public filing). Additionally, Defendants will submit, in camera and ex parte, an unredacted version of the privilege log, along with a copy of the documents proposed by the Court for disclosure to Plaintiffs on July 9, bearing transparent redaction boxes over information that the Government has identified as privileged.

Respectfully Submitted,

BRETT A. SHUMATE  
*Assistant Attorney General*

DREW C. ENSIGN  
*Deputy Assistant Attorney General*

WILLIAM KANELIS

*Ethan B. Kanter*  
ETHAN B. KANTER  
*Chief, National Security Unit*  
*Office of Immigration Litigation*  
*P.O. Box 878, Ben Franklin Station*  
*Washington, D.C. 20001*

*Dated: July 8, 2025*

*Counsel for Defendants*

Beg. Bates Number	En. Bates Number	Custodian	Document Title	Document Date	From	To	Email CC	Email/Memo Subject	Privilege Designation	Privilege Description	Filing Status
00001	00002			03/07/2025	Watson, Andre	Whiting, Andrea Toll			none	none	Filed with June 11, 2025 In Camera Submission as law enforcement sensitive, with protective order not yet entered, and regarded as outside the scope of this case as an unresolved issue in the subject's case (a point since clarified), and has not been disclosed publicly, but Defendants would be willing to share it subject to an Attorneys Eyes Only restriction.
00003	00003	William Walker		03/09/2025 05:56:44 PM	LE/PII @hsi.dhs.gov	Walker, William S [William.S.Walker@hsi.dhs.gov]		Re: Draft Statement/Response	Law Enforcement, Personally Identifiable Information	LEP, PII - Contains names and contact information of non-public facing Homeland Security Investigations law enforcement personnel which, if disclosed, could compromise the safety of such individuals	Filed with July 2, 2025 In Camera Submission
00004	00004	William Walker		03/09/2025 06:48:29 PM	LE/PII	Walker, William S [William.S.Walker@hsi.dhs.gov]		RE: Draft Statement/Response	Law Enforcement, Personally Identifiable Information	LEP, PII - Contains names and contact information of non-public facing Homeland Security Investigations law enforcement personnel which, if disclosed, could compromise the safety of such individuals	Filed with July 2, 2025 In Camera Submission
00005	00010	LE/PII		03/23/2025 07:35:37 PM	LE/PII @ice.dhs.gov	LE/PII @ice.dhs.gov	LE/PII @ice.dhs.gov; LE/PII @ice.dhs.gov; LE/PII @ice.dhs.gov; LE/PII @ice.dhs.gov		Law Enforcement, Personally Identifiable Information, Attorney-Client Privilege, Attorney Work Product	LEP, PII - Contains names and contact information of non-public facing Homeland Security Investigations law enforcement personnel which, if disclosed, could compromise the safety of such individuals; ACP/AW: consists of correspondence between attorneys for ICE's Office of the Principal Legal Advisor (OPLA) and employees of ICE Homeland Security Investigations (HSI) and Enforcement and Removal Operations (ERO) about questions surrounding the applicability of a particular removability charge under the Immigration and Nationality Act; updates from ERO to OPLA attorneys regarding issues with arresting a person of interest; ERO employee discussing the use of law enforcement systems and databases to conduct investigations with OPLA attorneys; and conversations between OPLA attorneys discussing HSI investigation results and issues surrounding that person of interest.	Filed with July 2, 2025 In Camera Submission
00011	00015		Action Memo for the Secretary	3/8/2025	Armstrong, John	U.S. Secretary of State		Removal of [specific individual LPRs], under Section 237(a)(4)(C) of the Immigration and Nationality Act	Deliberative Process, Personally Identifiable Information	DP: contains candid, internal deliberations assessing pre-decisional recommendations on enforcement actions regarding a specific non-citizen (see Armstrong Declaration at Dkt. # 170-8); PII: DOB of non-party individuals on p. 00011	Filed with June 11, 2025 In Camera Submission, withheld from Plaintiffs in full; Privilege declaration filed in support of opposition to Plaintiffs' motion to compel and upheld on June 30, 2025 when the Court denied the motion to compel (Dkt. # 174)
00016	00019		Action Memo for Senior Bureau Official John Armstrong	3/21/2025	Wilson, Stuart	Armstrong, John		(SBU) Revocation of F1 Visa for Rumeysa OZTURK	Deliberative Process, Personally Identifiable Information	DP: contains candid, internal deliberations assessing pre-decisional recommendations on enforcement actions regarding a specific non-citizen (see Armstrong Declaration at Dkt. # 170-8); PII: DOB of non-party individual on p. 00016	Filed with June 11, 2025 In Camera Submission, withheld from Plaintiffs in full; Privilege declaration filed in support of opposition to Plaintiffs' motion to compel and upheld on June 30, 2025 when the Court denied the motion to compel (Dkt. # 174)

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

*Date: July 8, 2025*

By: *Ethan B. Kanter*  
ETHAN B. KANTER  
*Chief, National Security Unit*  
*Office of Immigration Litigation*  
*P.O. Box 878, Ben Franklin Station*  
*Washington, D.C. 20001*